



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

DMP:NJM
F. #2015R01787

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 15, 2018

By FedEx and ECF

Robert J. Cleary, Esq.
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Eleven Times Square
New York, NY 10036

Re: United States v. Dan Zhong and Landong Wang
Criminal Docket No. 16-614 (DLI)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes discovery with respect to the above-referenced matter, the contents of which have been designated “Sensitive Discovery Material” under the terms of the Protective Order dated February 22, 2017 (Dkt. No. 37) (the “February 22 Order”). This disclosure supplements the government’s earlier disclosures under cover of letters dated February 15, May 22, May 24, June 12, July 12, July 24, August 30, October 24, December 1, December 8, December 14, December 17, and December 22, 2017, and January 15, January 18, January 19, February 2, and February 7, 2018. The government renews its request for reciprocal discovery from the defendant.

Enclosed is an encrypted thumb drive containing the following materials, which have been designated “Sensitive Discovery Material” under the February 22 Order. The drive contains:

- Audio recordings made during the time period from approximately September 17, 2015, through approximately October 13, 2015, which have been designated “Sensitive Discovery Material” under the February 22 Order. (ESI 38699 – ESI 38718).

- Electronically stored information (“ESI”) extracted from three electronic devices obtained from an individual during the search of the premises located at 210 Pavonia Avenue, Jersey City, New Jersey, which has been designated “Sensitive Discovery Material” under the February 22 Order. (ESI 38719 – ESI 38721).
- Primarily foreign-language ESI obtained from a search of email accounts, which has been designated “Sensitive Discovery Material” under the February 22 Order. (ESI 38722 – ESI 40493).
- ESI obtained from a search of email accounts, which were previously produced but which the government identified as containing technical errors in the initial production. (ESI 40494 – ESI 40830).
- Additional NIV application detail records from the United States Department of State, relating to A-2 and G-2 visas issued to employees of China Rilin Construction (Group) Co. Ltd., which are being produced in response to your January 5, 2018 request and which have been designated “Sensitive Discovery Material” under the February 22 Order. (DZ066139 – DZ066644).

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

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Enclosures (ESI00038699-ESI00040830)
(DZ066139-DZ066644)

cc: Clerk of the Court (DLI) (by ECF) (without enclosures)